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January 6, 2012

Hon. Michael A. Shipp
United States District Court
Martin Luther King Jr. Federal Bldg.
50 Walnut Street
Newark, NJ 07101

Re: White v. Smiths Detection, Inc.
Docket No. 2:10-cv-04078-SRC/MAS

Dear Judge Shipp:

This firm represents the Plaintiff, Sally White, in the above-captioned matter. The Plaintiff requests a modification of Your Honor's Text Order #87.

Pursuant to Your Honor's Order, counsels finalized and filed a Confidentiality Stipulation and Order covering the documents produced in discovery. As a result, defendants counsel delivered documents to me this week and I understand that more materials will be provided next week. Under the Order, I am to present to Your Honor the remaining discovery disputes in an informal motion to compel on Tuesday, January 10, 2012. I request an extension of time to file those papers because, for the reasons described above, I need more time to review the documents received two days ago, as well as those I expect to receive next week.

With my adversaries consent, I hereby request a two week extension of time from January 10 to January 24, 2012 for the Plaintiff to file her informal motion to compel, and, for the Defendants' response, an extension from January 17 to January 31, 2012. The Order also states that there will be a telephone status conference on January 24, 2012 at 10:30 A.M. We request that the court also change the date and time of the telephone status conference.

Respectfully submitted,
LAW OFFICE OF ELLEN O'CONNELL, L.L.C.

s/Ellen O'Connell

By: _____
Ellen O'Connell (EO0456)

Filed via ECF
cc: Sarah Bouchard, Esq.
Jyotin Hamid, Esq.